

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

NUANCE COMMUNICATIONS, INC.,

Plaintiff,

v.

OMILIA NATURAL LANGUAGE  
SOLUTIONS, LTD.,

Defendant

Case No. 1:19-CV-11438-MBB

**JURY TRIAL DEMANDED**

**DEFENDANT OMILIA NATURAL LANGUAGE SOLUTIONS, LTD.’S  
MOTION TO DISMISS**

Defendant Omilia Natural Language Solutions, Ltd. (“Omilia NLS”), by and through its counsel of record, hereby moves to dismiss Nuance Communications, Inc.’s (“Nuance”) Complaint in its entirety under Fed. R. Civ. P. 12(b)(2) and 12(b)(5). The grounds for this motion are set forth in the Memorandum of Points and Authorities submitted with this motion.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Omilia NLS believes that oral argument may assist the Court and requests oral argument of this motion.

Dated: August 22, 2019

Respectfully Submitted,

/s/ Kevin C. Adam  
Kevin C. Adam (SBN 684955)  
WHITE & CASE LLP  
75 State Street, 24th floor  
Boston, MA 02109  
(617) 979-9300

Dimitrios Drivas (*pro hac vice pending*)  
Raj Gandesha (*pro hac vice pending*)  
John Padro (*pro hac vice pending*)  
Leon Miniovich (*pro hac vice pending*)  
WHITE & CASE LLP  
1221 Avenue of the Americas  
New York, NY 10020-1095  
(212) 819-8286

Hallie Kiernan (*pro hac vice pending*)  
WHITE & CASE LLP  
3000 El Camino Real  
Two Palo Alto Square, Suite 900  
Palo Alto, CA 94306  
(650) 213-0300

*Counsel for Omilia Natural Language  
Solutions, Ltd*

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I hereby certify that on August 22, 2019, counsel for Omilia NLS and Nuance conferred in good faith about this motion but were unable to resolve or narrow the issues raised in this motion at this time. Counsel have agreed to continue to confer following the filing of this motion.

/s/ Kevin C. Adam

Kevin C. Adam

**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on August 22, 2019, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5.4 (c). Any other counsel of record will be served by First Class U.S. Mail on this same date.

/s/ Kevin C. Adam

Kevin C. Adam